

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**United States Steel Corporation – Gary Works
One North Broadway
Gary, Indiana 46402-3199**

Attention: Kenneth Mentzel, Manager, Environmental Control

Request to Provide Information Pursuant to the Clean Air Act

The ~~United States~~ Environmental Protection Agency (“EPA”) is requiring United States Steel Corporation (U.S. Steel, you) to submit certain information about your facility in Gary, Indiana (Facility). Appendix B specifies the information that you must submit. Unless explicitly noted in Appendix B, you must send this information to us within thirty (30) calendar days after you receive this request.

We are issuing this information request under section 114(a) of the Clean Air Act (the “Act”), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of the EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

U.S. Steel owns and operates an emission source or sources at its Gary, Indiana, facility. We are requesting this information to determine whether emission sources at the facility are complying with the Indiana State Implementation Plan and the Clean Air Act.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5

77 West Jackson Boulevard
Chicago, Illinois 60604

with copies to Indiana Department of Environmental Management:

Thomas Easterly, Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

You may consider the information confidential that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information under 40 C.F.R. Part 2, Subpart B. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims.

US Steel must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips, binder clips,

and 3-ring binders are acceptable.

Failure to comply fully with this request for information may subject US Steel to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Constantinos Loukeris at (312) 353-6198 or Brian Dickens at (312) 886-6073.

Date

Cheryl L. Newton, Director
Air and Radiation Division

Protecting the environment is everyone's responsibility. Help EPA fight pollution by reporting possible harmful environmental activity.
To do so, visit EPA's website at <http://www.epa.gov/compliance/complaints/index.html>

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Appendix A

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend, or other suitable form of notice, should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. Environmental Protection Agency (EPA) only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as “Personal Privacy Information” given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail

as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air-

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

1. Provide a narrative description of how U.S. Steel incorporated would addressed or accounted for be a more accurate term? blast furnace pressure relief valve emissions (also termed safety valves, bleeder valves, or dirty gas bleeds) into its Clean Air Act permits.
2. Provide a copy of the portions of the Title V application that reference any and all blast furnace relief valves or their emissions.
3. Per the October 26, 2007, Section 114 Clean Air Act Information Request, U.S. Steel submitted Table 1, below, which is Table 1 below is a partial summary of maintenance records submitted to EPA per the Section 114 Information Request (dated October 26, 2007) for equipment subject to 40 C.F.R. Part 61 Subpart V. For each record identified in Table 1 (where applicable), provide the following information (where applicable):
 - _____ Identification number(s) [Tag Number] of the equipment that required repair;
 - a. _____
 - b. Provide details as to how the leak was identified: visual, periodic monitoring, or other;
 - c. Instrument reading for the leak;
 - d. Date of initial attempt of repair, including the instrument reading, in part per million (ppm), confirming the leak repair;
 - e. Date of final attempt at repair (if the repair date is different for those provided below, please correct the date), including the instrument reading, in ppm, confirming the leak repair;
 - f. A copy of the work order generated for the repair;
 - g. Any other documentation or field notes regarding the repair;
 - h. Date of the previous two EPA Reference Method 21 readings for the component along with the ppm reading; and
 - i. Copies of the two prior weekly visual inspections performed on pumps prior to each leaking pump record below.

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Table 1: Maintenance Records Summary for US Steel's LDAR Program

Leak Date	Repair Date	Type of Report	Leak
12/12/2005	1/25/2006	Incident Report	Faulty valve on skimmer
8/29/2005	10/7/2005	Incident Report	Pinhole on valve on the 404 stripper
2/24/2005	5/20/2005	Incident Report	Blockage in drain trench
11/21/2003	11/21/2003	Incident Report	Packing leak on sump pump
9/15/2003	9/18/2003	Incident Report	Sump pump packing leaked
3/7/2003	3/10/2003	Incident Report	Bad seal and broken shaft on sump pump (Big south)
11/12/2002	11/11/2003	Incident Report	Pump packing leaked

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11/10/2002	11/10/2002	Incident Report	Plug blown on heat exchnager
6/25/2002	6/26/2002	Incident Report	O-ring failed
3/5/2007	-	Operator Turn Report	Fitting Leaking
3/8/2007	-	Oil and Tar Log	Centrifuge sump not working and still leaking
3/19/2007	-	Oil and Tar Log	Sump pump packing leaked
6/18/2007	-	Oil and Tar Log	P-363 B needs to be repacked
9/20/2007	-	Oil and Tar Log	P-363 B needs to be repacked
9/28/2007	-	Operator Turn Report	P-113B packing leaked
11/13/2007	-	Oil and Tar Log	P-363 B needs to be repacked
1/7/2006	-	Operator Turn Report	P-113B leaking
1/29/2006	-	Oil and Tar Log	P-304 A has blown seal
3/26/2006	-	Daily Check-off List	Blown Gasket on P-309 line
8/30/2006	-	Oil and Tar Log	Chloride Pumps down; south's packing is leaking
10/31/2006	-	Operator Turn Report	P-425B has blown seal
1/11/2005	-	Operator Turn Report	Leak under heat exchanger; P414B sparking from seal
6/1/2005	-	Oil and Tar Log	P-415 A caught fire
4/26 (no year)	-	Operator Turn Report	P-414 A discharge valve leaking
4/27 (no year)	-	Operator Turn Report	P-414 A discharge valve leaking
5/7/2002	-	Operator Turn Report	P-415 B has bad seal
5/8/2002	-	Operator Turn Report	P-415 A is leaking from seal, P-415 B back online
5/11/2002	-	Operator Turn Report	P-415 A is leaking oil
5/24/2002	-	Operator Turn Report	P-415 B blew a seal
5/27/2002	-	Operator Turn Report	P-415 A drained for maintenance
6/2/2002	-	Operator Turn Report	P-415 A ready if needed, but still needs maintenance
6/7/2002	-	Operator Turn Report	P-415 A changed today
7/21/2002	-	Operator Turn Report	P-415 A packing leaking
8/3/2002	-	Operator Turn Report	P-415 B leaking, P-415 A is down
9/4/2002	-	Operator Turn Report	P-9B blown seal; P-452 A blown seal; P-405 A blown seal removed; P-415 A blown seal; P-363 C blown seal
9/11/2002	-	Operator Turn Report	P-9B pump pulled; P-363 C bad seal; P-452 A blown seal; P-405 A pump pulled; P-415A bad seal
9/12/2002	-	Operator Turn Report	P-405A, P-415A, P-9B, P-363C are down

9/28/2002	-	Operator Turn Report	P-414 B bad seal
10/14/2002	-	Operator Turn Report	repair of P-110 A and leak at distillation
11/7/2002	-	Operator Turn Report	P-415 B down for maintenance
11/10/2002	-	Operator Turn Report	Leak on E-453 A
11/13/2002	11/22/2002	Operator Turn Report	P-414 B blown seal
12/11/2002	-	Operator Turn Report	P-425 A down for maintenance repair
12/12/2002	-	Operator Turn Report	Maintenance working on P-425 A
2/25/2003	-	Operator Turn Report	Maintenance changing P-113 D
4/10/2003	-	Operator Turn Report	P-425 B down for maintenance
4/23/2003	-	Operator Turn Report	P-119 A down for maintenance; 119 A suction valve is broken
10/24/2003	-	Operator Turn Report	P-415 A down for maintenance
12/18/2003	-	Operator Turn Report	Maintenance worked on P-414A, P-414 B keeps kicking out

4. For the leaks identified the incident report that led to spills (not sure what prior sentence means), provide the following information:

- a. The composition of the wastewater that spilled;
- b. How the quantity of wastewater spilled was estimated and or calculated;
- c. Was the wastewater recovered;
- d. If recovered, provide the procedures taken to recover the wastewater and where it was returned to in the process (if applicable);
- e. Was this spill included in US Steel's Total Annual Benzene reports.

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CERTIFICATE OF MAILING

I, Shanee Rucker, hereby certify that the attached Request for Information Pursuant to the Clean Air Act was sent by Certified Mail, Return Receipt to:

Kenneth Mentzel, Manager, Environmental Control
United States Steel Corporation – Gary Works
One North Broadway
Gary, Indiana 46402-3199

I also certify that a copy of the Request for Information pursuant to the Clean Air Act was sent by First Class Mail to:

Thomas Easterly, Commissioner
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

on the ____ day of _____ 2007.

Shanee Rucker, Secretary
EPA Region 5, ARD
AECAS (MI/WI)

Certified Mail Receipt Number:

standard bcc's: official file copy w/ attachment(s)

other bcc's: